(c) Remarks

The claims are 1-12 and 14 with claims 1-4 being independent. Claims 1-4 were amended pursuant to Example I, page 30, lines 19-23; page 31, lines 9-13; page 32, lines 1-5 and page 33, lines 6-17 to provide that the first and second discharge means are each electrodes connected to an RF power source. Reconsideration of the claims is expressly requested.

Claims 1-12 and 14 were rejected as obvious over Moslehi '609 in view of Chan '811. The grounds of rejection are respectfully traversed.

Prior to addressing the grounds of rejection, Applicant wishes to briefly review certain key features and advantages of the present claimed invention. In order to meet the problem of fluctuating temperatures during deposition and others, a plurality of discharge means are disposed in the reactor in order to provide better control of film formation temperature. When the substrate is conveyed through the reactor during film formation, power from RF power sources is applied to plural electrodes and is controlled or changed in order to form a deposited film of semiconductive layers having the same conductivity type. The deposited film formed at the second stage is a different position on the beltlike substrate from the corresponding film formed at the first stage. As noted in the Examples, the deposited films provide members with enhanced photoelectric conversion efficiency.

Moslehi in Fig. 2 and in Col. 8, lines 56-68 teaches use of five (5) independent energy sources. Moslehi employs thermal energy sources, electron cyclotron resonance microwave plasma sources, deep ultraviolet incoherent photochemical sources,

deep ultraviolet excimer laser photochemical sources and RF magnetron plasma sources. In col. 9, lines 8-37, it is disclosed that ECR plasma source, wafer heating source, RF magnetron source and photochemical energy sources are all used to conduct nine subprocesses - from dry cleaning, to epitaxial growth, to oxidation, to layer deposition and to layer doping.

The discharge means are switched from very different types of energy sources beginning with deep u.v. incoherent sources in the dry cleaning steps, to microwave plasma energy, wafer heating, and other sources, see Cols. 9-11 in subsequent steps. Therefore, in Moslehi the discharge means are different in kind from each other, ranging from u.v. irradiation to microwave irradiation, thermal heating, RF power and ECR plasma. These sources do not act in concert as in applicant's first and second electrodes connected to RF power sources to form deposited films of semiconductor layers and acting at different positions in a belt-like substrate.

Moslehi is devoid of disclosure relating to applicant's first and second steps of applying electric power at pre-set temperatures at different belt positions. In Chen different plasmas form different layers. In Chen there is no teaching of employing plural electrodes to form the same film layer.

Accordingly, Applicant submits that none of the references, whether alone or combined, discloses or suggests the present claimed invention nor renders it unpatentable. Accordingly, it is respectfully requested that the claims be allowed and that the case be passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

/Peter Saxon/
Peter Saxon
Attorney for Applicants
Registration No. 24,947

FITZPATRICK, CELLA, HARPER & SCINTO 30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

FCHS_WS 1709580v1